Commonwealth of Kentucky
Division for Air Quality

PERMIT STATEMENT OF BASIS

TITLE V (DRAFT PERMIT) NO. V-03-021
DANA CORPORATION – VICTOR REINZ
DANVILLE, KY
APRIL 25, 2003
JOSHUA J. HIGGINS, REVIEWER
PLANT I.D. # 21-021-00049
APPLICATION LOG # 55322

SOURCE DESCRIPTION:

The DANA Corporation – Victor Reinz Division at 500 Techwood Lane in Danville (Boyle County), manufactures automotive steel gaskets. They have been registered as a minor source since February 2000 (Log # 51361). In October 2002 the facility applied for modification to their minor source registration due to a formulation change used in some of their coatings. This registration was approved in November 2002 (Log # 55282). This permit is being issued based on the fact that the facility is planning an upgrade in the spring of 2003. With the upgrade the facility will consist of two Multi-Layer Steel (MLS) production lines. Each line will consist of a series of coating applicators and drying ovens. In April 2003, in the midst of the Title V review process, DANA submitted a registration (Log # 55689) for construction of a Compact Valveless Regenerative Thermal Oxidation (VRTO) System. Even though the VRTO was submitted as a part of the Title V application, the Division approved the registration because of the fact that the facility was an existing registered source, would remain eligible for registration after the change (401 KAR 52:070, Section 4(2)(a)), and that immediate installation of the control device would be environmentally beneficial.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.

APPLICATION COMMENTS:
Title V (Draft Permit), Log # 55322

COMMENTS:

Permit Processing Timeline:

The draft permit was issued within the regulatory time frame. See the requirements in Section 2 of the Cabinet Provisions and Procedures for Issuing Title V Permits manual, which is incorporated by reference in 401 KAR 52:020, and the dates of significant events listed below.

November 8, 2002. Application Received.
January 8, 2003. Application deemed administratively complete by default (even though it lacked all required technical information).
January 10, 2003. Application assigned to reviewer.
February 19, 2003. Telephonic Notice of Deficiency (NOD) for corrections to 7007B and N forms, and clarification of EP 04 emission factors. Regulatory clock stopped.
February 20, 2003. Information received and NOD deemed complete. Regulatory clock resumed.
February 28, 2003. NOD letter issued for lack of control device. Regulatory clock stopped.
March 11, 2003. Telephonic NOD for confirmation of insignificant activities and removal of previously registered equipment.
March 13, 2003. Information received and 03/11/03 NOD deemed complete.
March 19, 2003. Control device information received.
April 7, 2003. Additional control device information received and 02/28/03 NOD deemed complete. Regulatory clock resumed.
April 15, 2003. Meeting between DAQ, and the source and their consultant. NOD for mixing and clean-up operations emission factors. Regulatory clock stopped.
April 25, 2003. Draft permit approved, assuming mixing and clean-up operations will be insignificant activities. However, a "worst case" scenario was applied to the material balance equation by including these emissions.

Type of control and efficiency:

Type: Compact Valveless Regenerative Thermal Oxidation System
Model: VRTO-C
Manufacturer: Eisenmann
Destruction Efficiency: 99%
Burner/Combustion Chamber: Single Maxon or equivalent burner
Fuel: Natural Gas
Rated capacity: 6 mmBtu/hr
Date constructed: 2003 (anticipated)

Emission factors and their source:

A combination of AP-42 emission factors, material balance, site testing and vendor guarantees have been used to estimate emissions in the application.

Applicable regulation:

Note: Only specific regulations have been listed here, no generally applicable regulations are listed.
401 KAR 59:225, *New Miscellaneous Metal Parts and Products Surface Coating Operations,* applies to the VOC emissions of the two MLS coating lines.

Anything unusual about the:

1) Emission point number and description. Emission point numbers in parenthesis within the

permit are EP numbers provided by the source. These emission points were then grouped together by coating line to create one EP for each coating line. Emission points that are not a part of the coating lines and are not subject to 401 KAR 59:225 are listed as separate emission points, but grouped together within Section B to save space.

2) Regulations that are not applicable. There are currently no National Emission Standards for Hazardous Air Pollutants (NESHAPs) regulations that apply to the source as long as metal gaskets are the only types of gaskets produced. See the determination letter from the Division to the source dated February 28, 2003 for more details.

EMISSION AND OPERATING CAPS DESCRIPTION:

Emission Limitations. Pursuant to 401 KAR 59:225, Section 3, emissions discharged into the atmosphere from the coating lines shall be no more than fifteen (15) percent by weight of the VOCs net input into the affected facility.

Operating Limitations. Performance testing will determine the minimum combustion temperature for the VRTO and the minimum average gas volumetric flow rate or duct static pressure for each specific capture device in the capture system. Additionally, emissions from all processes listed in the permit as a portion of the coating lines shall be vented to the VRTO at all times, and the VRTO shall be operational at all times that either of the two coating lines is operating.

PERIODIC MONITORING:

See the permit for Specific Monitoring Requirements.